UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED
SEP 2 7 2010
David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA	X	
	X	
v.	X	CRIMINAL NO.
	X	
DONAL MONTA AMERSON	X	
aka Money	X	H 10 - 0306S
	X	
JUMOND ANTHONY BURRELL	X	
	X	
ZARICK BANARD SHIVERS	X	
aka Ace	X	
	X	
JOHNNIE WILLIE HICKMAN	X	
aka Uncle Johnnie	X	
	X	
BENNIE RAY HAWKINS, JR.	X	
aka Lil Bennie	X	
aka Black	X	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
Conspiracy to Possess with Intent to Distribute a Controlled Substance

Beginning on or about December 12, 2008, and continuing to on or about April 16, 2010, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

DONAL MONTA AMERSON
aka Money

JUMOND ANTHONY BURRELL

ZARICK BANARD SHIVERS
aka Ace

JOHNNIE WILLIE HICKMAN
aka Uncle Johnnie

and

BENNIE RAY HAWKINS, JR.
aka Lil Bennie
aka Black

defendants herein, did knowingly and unlawfully conspire, confederate and agree with each other and others, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved less than one hundred (100) kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance; five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and, fifty (50) grams or more of a mixture and substance containing a detectable amount of cocaine base or crack cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(iii), 841(b)(1)(B)(ii), 841(b)(1) (C) and 846.

COUNT TWO
Possession with Intent to Distribute a Controlled Substance

On or about December 12, 2008, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

DONAL MONTA AMERSON
aka Money

defendant herein, did knowingly and unlawfully aid, abet and assist another and others, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved less than five hundred (500) grams of a mixture and substance containing a detectable amount of cocaine, a Scheduled II controlled substance.

In violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE
Possession with Intent to Distribute a Controlled Substance

On or about October 7, 2009, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

DONAL MONTA AMERSON
aka Money
and
BENNIE RAY HAWKINS, JR.
aka Lil Bennie
aka Black

defendants herein, did knowingly and unlawfully aid, abet and assist each other and others, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly known as crack cocaine, a Schedule II controlled substance.

In violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii).

COUNT FOUR
Using and Carrying a Firearm During a Drug Trafficking Crime

On or about October 7, 2009, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

BENNIE RAY HAWKINS, JR.
aka Lil Bennie
aka Black

defendant herein, did knowingly and unlawfully use and carry a firearm, namely:

a Century Arms, .223 caliber, assault rifle,

during and in relation to a drug trafficking crime, and, in furtherance of a drug trafficking crime, did knowingly and unlawfully possess said firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i), and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iii) and Title 18, United States Code, Section 2.

COUNT FIVE

Possession with Intent to Distribute a Controlled Substance

On or about December 4, 2009, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

DONAL MONTA AMERSON
aka Money

and

JUMOND ANTHONY BURRELL

defendants herein, did knowingly and unlawfully aid, abet and assist each other and others, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved less than five hundred (500) grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

Possession with Intent to Distribute a Controlled Substance

On or about April 16, 2010, in the Houston Division of the Southern District of Texas, and elsewhere within the jurisdiction of the Court,

DONAL MONTA AMERSON
aka Money

ZARICK BANARD SHIVERS
aka Ace
and

JOHNNIE WILLIE HICKMAN
aka Uncle Johnnie

defendants herein, did knowingly and unlawfully aid, abet and assist each other and others, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved less than one hundred (100) kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance; five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and, less than five (5) grams of a mixture and substance containing a detectable amount of cocaine base or crack cocaine, a Schedule II controlled substance.

In violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii) and 841(b)(1)(C).

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
United States Attorney
Southern District of Texas

BY: ______________________________
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